

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

DECLARATION OF FAMILIAL RELATIONSHIP

I, Katherine Wynn, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Katherine Wynn. I was an aunt of Peggie Maxine Hurt, who died on September 11, 2001 when the Pentagon was attacked in conjunction with the attack on the World Trade Center in New York. My niece Peggie, who was an accountant for the United States Army, had only been stationed at the Pentagon for two weeks when she died.

2. For the reasons set forth below, I respectfully request that I should be deemed to have been during Peggie's life an immediate family member entitled to be compensated financially by the defendants for Peggie's death.

3. The Hurt family of Kenbridge, Virginia, was and remains a close-knit family in which all the members provide mutual support, care, and solace. Peggie lived in the family house in Kenbridge as a child and through her college years, with her maternal grandparents – my parents – and with my sister Margaret. I then lived in the house next door in Kenbridge, and I saw Peggie virtually every day.

4. As Peggy was growing up, she and my daughter Connie would play together nearly every day, either at my parents' house or mine. Connie was almost exactly one year older

than Peggie. I looked on Peggie as another daughter, and I know she looked on me as another mother.

5. On many occasions as Peggie grew up, she went on trips with Connie and me. There was just no way in which she and Connie were treated differently, or treated me differently.

6. Our family was and remains extremely close. One indication of the closeness of our family was the Hurt family signers, which we all participated in and which sang at congregations in the Kenbridge area. ^{Peggie K.W.} ~~Pennie~~ had a beautiful voice and led us all.

7. After college, ^{Peggie K.W.} ~~Pennie~~ moved away to take a job with the State of Virginia. We continued to see each other whenever she came back to Kenbridge, and she sent me every year Mother's Day and birthday cards. We remained extremely close to the time of her death, and the loss was to me no different than would be the loss of my own daughter.

8. After Pennie's death, I applied to the Victims' Compensation Fund as an immediate family member, and in 2004 I was awarded \$96,737.03, which I understand constitutes a determination by the Fund that I am a member of the immediate family entitled to share in any recovery stemming from Peggie's death.

Executed on: August 8, 2019

Name (Signature): Katherine H. Wynn
Name (Print): Katherine H. Wynn